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**THE  
CITY OF LOS ANGELES**

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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

WILLARD L. WOODS, JR., on behalf of  
Writers' Guild-Industry Health Fund and  
Producer-Writers Guild of America  
Pension Plan.

44-00164 - TGG  
CASE N.

**COMPLAINT FOR VIOLATION OF  
AGREEMENTS TO MAKE BENEFIT  
CONTRIBUTIONS**

[29 U.S.C. §§ 185(a), 1132(a) and 1145]

**Plaintiff,**

vs.

TRANSFORMATION VENTURES, INC.,  
a California corporation; and WILLIAM N.  
PHILLIPS, an individual.

#### **Defendants.**

Plaintiff alleges as follows:

#### [JURISDICTION AND VENUE]

1. This is an action by a fiduciary of employee benefit plans for damages for violation of agreements by an employer to contribute to the plans. This Court has

jurisdiction under Employee Retirement Income Security Act (“ERISA”) §§ 502 & 515, 29 U.S.C. §§ 1132 & 1145, and under Labor Management Relations Act (“LMRA”) § 301(a), 29 U.S.C. § 185(a). Venue is proper under ERISA § 502(e)(2), 29 U.S.C. § 1132(e)(2), and under LMRA § 185(a) & (c), in that the plans are administered, the plans maintain their principal office, the breaches of the applicable agreements took place, and the defendants do business in this district.

**[PARTIES]**

2. Plaintiff WILLARD L. WOODS, JR. (“WOODS”), is the administrator and, in light of certain discretionary functions he exercises, a fiduciary of the Writers’ Guild-Industry Health Fund (“Health Fund”) and of the Producer-Writers Guild of America Pension Plan (“Pension Plan”) (jointly, the “Plans”). The Plans are each employee benefit plans within the meaning of ERISA § 3(3), 29 U.S.C. § 1002(3), multi-employer plans within the meaning of ERISA § 3(37)(A), 29 U.S.C. § 1002(3)(37)(A), and subject to the provisions of LMRA § 302(c)(5), 29 U.S.C. § 186(c)(5). WOODS brings this action in his capacity as a fiduciary of the Plans.

3. WOODS is informed and believes that defendant TRANSFORMATION VENTURES, INC. (“TVI”) is a California corporation, and an employer within the meaning of LMRA § 501(3), 29 U.S.C. § 142(3), and ERISA § 3(5), 29 U.S.C. § 1002(5).

4. WOODS is informed and believes that defendant WILLIAM N. PHILLIPS (“PHILLIPS”) is an individual and the principal officer and owner of defendant TVI.

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## **[AGREEMENTS]**

5. At all relevant times, TVI and the Writers Guild of America, a labor organization, have been parties to a written collective-bargaining agreement, known as the 2008 Writers Guild of America Theatrical and Television Basic Agreement (“2008 MBA”), by which TVI agreed to submit reports and make contributions to the Plans in accordance with the terms of the 2008 MBA.

6. Article 17.B. of the 2008 MBA provides that a participating company shall contribute to the Pension Plan "amounts equal to six percent (6%), effective February 13, 2008, of all 'gross compensation' earned and paid or due to writers for services covered by and subject to this Agreement performed after the effective date hereof, in an employment capacity (to which employment the provisions of this Basic Agreement apply)."

7. Article 17.C. provides that a participating company shall contribute to the Health Fund "amounts equal to eight and one-half percent (8.5%) of all 'gross compensation' earned and paid or due to writers for services covered by and subject to this Agreement performed on or after the effective date hereof, in an employment capacity (to which employment the provisions of this Basic Agreement apply), except that during the period October 1, 2008 through March 31, 2009, said contribution rate shall be eight percent (8%)."

8. The 2008 MBA contains a “Sideletter on Literary Material Written for Programs for New Media” (“Sideletter”). Section 3.b.1. of the Sideletter provides that, for “Original New Media Productions,” Article 17 of the 2008 MBA shall be incorporated herein and shall apply to the employment of a writer in connection with original new media productions.

1       9. Article 17.A. of the 2008 MBA provides that signatory employers, such as  
2       TVI, agree to “adopt and are bound by the Trust Agreements and amendments thereto of  
3       the Writers’ Guild-Industry Health Fund and the Producer-Writers Guild of America  
4       Pension Plan, and by all actions of the Trustees pursuant to those Agreements.” These  
5       agreements and declarations of trust of each of the Plans, which are incorporated by  
6       reference under the 2008 MBA, are referred to hereinafter as the “Trust Agreements.”  
7

8       10. Article III, Section 4 of the Health Fund trust agreement and Article III,  
9       Section 5 of the Pension Plan trust agreement each provide that an employer that fails to  
10      timely pay contributions due to the Plans shall be in default and such a default employer,  
11      in addition to the unpaid or delinquent contributions, shall also owe interest and  
12      liquidated damages at the rates established by the Trustees of the Plans. The Trustees of  
13      the Plans have established liquidated damages of 20% as the penalty for delinquent  
14      contributions, along with interest at the rate of 10% per year, plus the Plans’ audit costs  
15      and attorney’s fees.  
16

17       11. In order to curtail practices which appear to circumvent the intent of the  
18      Trust Agreements and create a drain on the assets of the Plans, on January 1, 2001, the  
19      Trustees of the Plans adopted various rules governing eligibility for benefits thereunder.  
20      One such rule, which is applicable here, provides that, “Contributions on the Writer’s  
21      compensation do not count toward the Writer’s eligibility for benefits when the Writer is  
22      employed for writing and other services (other than under Article 14 of the Basic  
23      Agreement) and the Writer’s contract does not separate writing compensation from  
24      compensation for other services unless the employer contributes on the lower of: (a) one  
25      hundred percent (100%) of the Writers’ total compensation under the contract, or (b)  
26      \$125,000\*\*.” \*\*\*The Fund’s actuary estimated that contributions on \$125,000.00 of  
27      compensation was the amount necessary in 2000 to pay the cost of the annual Health  
28      Fund coverage for an eligible participant. Periodically, this figure will be adjusted to

approximate the annual cost to the Health Fund of coverage.” This amount was adjusted to \$126,459.00 for 2008, \$122,906.00 for 2009, and \$141,858.82 for 2010.

12. PHILLIPS and the Writers Guild of America concurrently entered into a written assumption agreement wherein PHILLIPS agreed to personally guarantee performance of the written collective-bargaining agreement between TVI and the Writers Guild of America, and to personally assume all obligations incurred by TVI under the written collective-bargaining agreement, including the Trust Agreements. PHILLIPS is therefore jointly and severally liable for the obligations of TVI.

13. Accordingly, based on the foregoing, defendants TVI and PHILLIPS are therefore referred to collectively hereafter as the “EMPLOYER.”

#### [AUDIT]

14. The trustees of the Plans retained an accounting firm to conduct an audit of the books and records of the EMPLOYER for the period February 13, 2008 through September 30, 2010 (“Audit”).

15. Although the Plans’ auditors contacted the EMPLOYER’s representatives beginning in June 2011 to provide the requested books and records for the Plans’ audit, the EMPLOYER initially refused to cooperate with the audit and did not produce the requested records and information to the Plans’ auditors until 2012. Based on the records and information subsequently provided by the EMPLOYER, the Plans’ auditors issued a draft audit report on about May 24, 2012, and finalized the audit report on about August 20, 2012. The final audit report provides that the auditors discovered that \$1,333,797.50 of compensation had been paid by the EMPLOYER to writer Theresa Coyle (“Coyle”), from the first quarter of 2008 through the third quarter of 2010, whereas the EMPLOYER

1 only reported to the Plans compensation to Ms. Coyle of \$31,250 for the third quarter of  
2 2008, \$32,700 for the second quarter of 2009, and \$34,000 for the first quarter of 2010,  
3 for a total of \$97,950.

4

5 **CLAIM FOR RELIEF FOR DELINQUENT CONTRIBUTIONS**

6 [Against Defendants TVI and PHILLIPS, jointly and severally]

7

8 16. Plaintiff WOODS repeats, realleges, and incorporates by reference each and  
9 every allegation contained in paragraphs 1 through 15 above as if fully set forth here.

10

11 17. The EMPLOYER hired writer Theresa Coyle to perform writing services,  
12 which Coyle performed for the EMPLOYER and for which the EMPLOYER was  
13 required to make contributions to the Plans.

14

15 18. The agreement between the EMPLOYER and Mr. Coyle commissions Coyle  
16 to perform various services, including (1) writing and editing stories to appear on the  
17 Transformation.com website, (2) filming and editing of defendant PHILLIPS' speeches  
18 to appear on the website, (3) writing and producing a television special for distribution on  
19 broadcast and cable TV, the internet, and DVD, and (4) assisting in the hiring and  
20 scheduling of television crews for the new media project known as "Transformation with  
21 Bill Phillips" for compensation of \$12,500 per week. In the agreement, there is no  
22 specific allocation of the weekly fees to Coyle's writing services.

23

24 19. As revealed during the Audit of the EMPLOYER, and based on the Plans'  
25 rule described in paragraph 12 above, the Plans' auditors discovered that the  
26 EMPLOYER under-reported compensation for Ms. Coyle totaling \$293,273.82  
27 (\$126,459 + \$122,906 + \$141,858.82 - \$97,950) for the period covering 2008 through  
28 2010 and, correspondingly, under-reported and failed to pay contributions to the Health

1 Fund totaling \$24,616.55, and contributions to the Pension Plan totaling \$17,596.44,  
2 based upon the under-reported compensation totaling \$293,273.82. To date, the  
3 EMPLOYER has failed and refused to pay this delinquency.

4

5 20. Based on the results of the Audit, the EMPLOYER also owes interest to the  
6 Health Fund of \$9,478.96 and interest to the Pension Plan of \$6,992.47, and liquidated  
7 damages to the Health Fund of \$4,923.31 and liquidated damages to the Pension Plan of  
8 \$3,519.29, based upon the delinquent contributions in paragraph 19 above.

9

10 21. The Plans were required to engage the services of an auditing firm to  
11 perform the Audit, and were billed the sum of at least \$17,868.75 for the Audit. Pursuant  
12 to the Trust Agreements, the Plans are entitled to reimbursement of its Audit costs  
13 totaling \$17,868.75 from the EMPLOYER.

14

15 **[ATTORNEY'S FEES]**

16

17 22. WOODS was required to engage legal counsel to collect the EMPLOYER's  
18 delinquencies and is entitled to recover the Plans' costs, liquidated damages, interest, and  
19 attorney's fees pursuant to the Plans' Trust Agreements and ERISA § 502(g)(2)(D), 29  
20 U.S.C. § 1132(g)(2)(D).

21

22 **[PRAYER FOR RELIEF]**

23

24 FOR THESE REASONS, WOODS requests that the court enter judgment against  
25 defendants TVI and PHILLIPS, jointly and severally, as follows:

26

27 (a) Delinquent contributions in the amount of at least \$42,212.99;

28 ////

(b) Interest in the amount of at least \$16,471.43, and continuing at the rate of 10% per year (0.83% per month) until paid;

(c) Liquidated damages in the amount of \$8,442.60;

(d) Audit costs in the amount of \$17,868.75, as required by the Trust Agreements and ERISA § 502(g)(2), 29 U.S.C. § 1132(g)(2);

(e) Attorney's fees and costs; and

(f) Such additional relief as the court finds proper.

Respectfully submitted,

**REICH, ADELL & CVITAN**  
A Professional Law Corporation

By: WILLIAM SHEH  
Attorneys for Plaintiff  
WILLARD L. WOODS, JR.

**COPY**  
**UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA**  
**CIVIL COVER SHEET**

<b>I. (a) PLAINTIFFS</b> ( Check box if you are representing yourself <input type="checkbox"/> )  WILLARD L. WOODS, JR., on behalf of Writers' Guild-Industry Health Fund and Producer-Writers Guild of America Pension Plan		<b>DEFENDANTS</b> ( Check box if you are representing yourself <input type="checkbox"/> )  TRANSFORMATION VENTURES, INC., a California corporation; and WILLIAM N. PHILLIPS, an individual,																																																																																																																																														
(b) County of Residence of First Listed Plaintiff <u>Los Angeles</u> <i>(EXCEPT IN U.S. PLAINTIFF CASES)</i>		County of Residence of First Listed Defendant <i>(IN U.S. PLAINTIFF CASES ONLY)</i>																																																																																																																																														
(c) Attorneys (Firm Name, Address and Telephone Number) If you are representing yourself, provide the same information.  Hirsch Adell, William Sheh, and Natalia Bautista, Members of REICH, ADELL & CVITAN, a Professional Law Corporation 3550 Wilshire Blvd., Suite 2000, Los Angeles, CA 90010 Telephone: (213) 386-3860		Attorneys (Firm Name, Address and Telephone Number) If you are representing yourself, provide the same information.																																																																																																																																														
<b>II. BASIS OF JURISDICTION</b> (Place an X in one box only.)		<b>III. CITIZENSHIP OF PRINCIPAL PARTIES-For Diversity Cases Only</b> (Place an X in one box for plaintiff and one for defendant)																																																																																																																																														
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<b>VI. CAUSE OF ACTION</b> (Cite the U.S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.)  Complaint for delinquent contributions to employee benefit plans pursuant to ERISA Sections 502 and 515, 29 U.S.C. Sections 1132 and 1145.																																																																																																																																																
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Procedures</b>	<b>REAL PROPERTY</b>	<b>360 Other Personal Injury</b>	<b>CIVIL RIGHTS</b>	<b>LABOR</b>	<input type="checkbox"/> Act/Review of Appeal of Agency Decision	<input type="checkbox"/> 210 Land Condemnation	<input type="checkbox"/> 361 Personal Injury-Med Malpractice	<input type="checkbox"/> 440 Other Civil Rights	<input type="checkbox"/> 710 Fair Labor Standards Act	<input type="checkbox"/> 950 Constitutionality of State Statutes	<input type="checkbox"/> 220 Foreclosure	<input type="checkbox"/> 362 Personal Injury-Med Malpractice	<input type="checkbox"/> 441 Voting	<input type="checkbox"/> 720 Labor/Mgmt. Relations		<input type="checkbox"/> 230 Rent Lease & Ejectment	<input type="checkbox"/> 363 Personal Injury-Product Liability	<input type="checkbox"/> 442 Employment	<input type="checkbox"/> 740 Railway Labor Act			<input type="checkbox"/> 364 Personal Injury-Product Liability	<input type="checkbox"/> 443 Housing/Accomodations	<input type="checkbox"/> 751 Family and Medical Leave Act			<input type="checkbox"/> 365 Personal Injury-Product Liability	<input type="checkbox"/> 444 American with Disabilities-Employment	<input type="checkbox"/> 790 Other Labor Litigation			<input type="checkbox"/> 366 Personal Injury-Product Liability	<input type="checkbox"/> 445 American with Disabilities-Other	<input type="checkbox"/> 791 Employee Ret. Inc. Security Act			<input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury	<input type="checkbox"/> 446 Education				<input type="checkbox"/> 368 Asbestos Personal Injury					<input type="checkbox"/> 369 Product Liability		
<b>OTHER STATUTES</b>	<b>CONTRACT</b>	<b>REAL PROPERTY CONT.</b>	<b>IMMIGRATION</b>	<b>PRISONER PETITIONS</b>	<b>PROPERTY RIGHTS</b>																																																																																																																																											
<input type="checkbox"/> 375 False Claims Act	<input type="checkbox"/> 110 Insurance	<input type="checkbox"/> 240 Torts to Land	<input type="checkbox"/> 462 Naturalization Application	<b>Habeas Corpus:</b>	<input type="checkbox"/> 820 Copyrights																																																																																																																																											
<input type="checkbox"/> 400 State Reapportionment	<input type="checkbox"/> 120 Marine	<input type="checkbox"/> 245 Tort Product Liability	<input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 463 Alien Detainee	<input type="checkbox"/> 830 Patent																																																																																																																																											
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<input type="checkbox"/> 450 Commerce/ICC Rates/Etc.	<input type="checkbox"/> 151 Medicare Act	<input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Vet.)	<input type="checkbox"/> 315 Airplane	<input type="checkbox"/> 535 Death Penalty	<input type="checkbox"/> 861 HIA (1395f)																																																																																																																																											
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FOR OFFICE USE ONLY:

Case Number:

CV14-00164

CIVIL COVER SHEET

**UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA  
CIVIL COVER SHEET**

**VIII. VENUE:** Your answers to the questions below will determine the division of the Court to which this case will most likely be initially assigned. This initial assignment is subject to change, in accordance with the Court's General Orders, upon review by the Court of your Complaint or Notice of Removal.

<b>Question A: Was this case removed from state court?</b>	<b>STATE CASE WAS PENDING IN THE COUNTY OF:</b>		<b>INITIAL DIVISION IN CACD IS:</b>
	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
<p>If "no," go to Question B. If "yes," check the box to the right that applies, enter the corresponding division in response to Question D, below, and skip to Section IX.</p>			
	<input type="checkbox"/> Los Angeles	<input type="checkbox"/> Ventura, Santa Barbara, or San Luis Obispo	Western
	<input type="checkbox"/> Orange	<input type="checkbox"/> Riverside or San Bernardino	Southern
	<input type="checkbox"/> Riverside or San Bernardino		Eastern

<b>Question B: Is the United States, or one of its agencies or employees, a party to this action?</b>	<b>If the United States, or one of its agencies or employees, is a party, is it:</b>		<b>INITIAL DIVISION IN CACD IS:</b>
	<input type="checkbox"/> A PLAINTIFF?	<input type="checkbox"/> A DEFENDANT?	
<p>Then check the box below for the county in which the majority of DEFENDANTS reside.</p>			
	<input type="checkbox"/> Los Angeles	<input type="checkbox"/> Los Angeles	Western
	<input type="checkbox"/> Ventura, Santa Barbara, or San Luis Obispo	<input type="checkbox"/> Ventura, Santa Barbara, or San Luis Obispo	Western
	<input type="checkbox"/> Orange	<input type="checkbox"/> Orange	Southern
	<input type="checkbox"/> Riverside or San Bernardino	<input type="checkbox"/> Riverside or San Bernardino	Eastern
	<input type="checkbox"/> Other	<input type="checkbox"/> Other	Western

<b>Question C: Location of plaintiffs, defendants, and claims? (Make only one selection per row)</b>	<b>A. Los Angeles County</b>	<b>B. Ventura, Santa Barbara, or San Luis Obispo Counties</b>	<b>C. Orange County</b>	<b>D. Riverside or San Bernardino Counties</b>	<b>E. Outside the Central District of California</b>	<b>F. Other</b>
Indicate the location in which a majority of plaintiffs reside:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Indicate the location in which a majority of defendants reside:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Indicate the location in which a majority of claims arose:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<b>C.1. Is either of the following true? If so, check the one that applies:</b>	<b>C.2. Is either of the following true? If so, check the one that applies:</b>
<input type="checkbox"/> 2 or more answers in Column C	<input type="checkbox"/> 2 or more answers in Column D
<input type="checkbox"/> only 1 answer in Column C and no answers in Column D	<input type="checkbox"/> only 1 answer in Column D and no answers in Column C
<p>Your case will initially be assigned to the SOUTHERN DIVISION. Enter "Southern" in response to Question D, below.</p> <p>If none applies, answer question C2 to the right. ➔</p>	
<p>Your case will initially be assigned to the WESTERN DIVISION. Enter "Western" in response to Question D below.</p> <p>If none applies, go to the box below. ↓</p>	

<b>Question D: Initial Division?</b>	<b>INITIAL DIVISION IN CACD</b>
Enter the initial division determined by Question A, B, or C above: ➔	WESTERN DIVISION

**UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA  
CIVIL COVER SHEET**

**IX(a). IDENTICAL CASES:** Has this action been previously filed in this court and dismissed, remanded or closed?  NO  YES

If yes, list case number(s): \_\_\_\_\_

**IX(b). RELATED CASES:** Have any cases been previously filed in this court that are related to the present case?  NO  YES

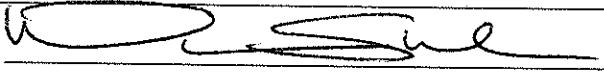
If yes, list case number(s): \_\_\_\_\_

**Civil cases are deemed related if a previously filed case and the present case:**

(Check all boxes that apply)

- A. Arise from the same or closely related transactions, happenings, or events; or
- B. Call for determination of the same or substantially related or similar questions of law and fact; or
- C. For other reasons would entail substantial duplication of labor if heard by different judges; or
- D. Involve the same patent, trademark or copyright, and one of the factors identified above in a, b or c also is present.

**X. SIGNATURE OF ATTORNEY**

(OR SELF-REPRESENTED LITIGANT): 

DATE: January 7, 2014

**Notice to Counsel/Parties:** The CV-71 (JS-44) Civil Cover Sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law. This form, approved by the Judicial Conference of the United States in September 1974, is required pursuant to Local Rule 3-1 is not filed but is used by the Clerk of the Court for the purpose of statistics, venue and initiating the civil docket sheet. (For more detailed instructions, see separate instructions sheet).

Key to Statistical codes relating to Social Security Cases:

Nature of Suit Code	Abbreviation	Substantive Statement of Cause of Action
861	HIA	All claims for health insurance benefits (Medicare) under Title 18, Part A, of the Social Security Act, as amended. Also, include claims by hospitals, skilled nursing facilities, etc., for certification as providers of services under the program. (42 U.S.C. 1935FF(b))
862	BL	All claims for "Black Lung" benefits under Title 4, Part B, of the Federal Coal Mine Health and Safety Act of 1969. (30 U.S.C. 923)
863	DIWC	All claims filed by insured workers for disability insurance benefits under Title 2 of the Social Security Act, as amended; plus all claims filed for child's insurance benefits based on disability. (42 U.S.C. 405 (g))
863	DIWW	All claims filed for widows or widowers insurance benefits based on disability under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405 (g))
864	SSID	All claims for supplemental security income payments based upon disability filed under Title 16 of the Social Security Act, as amended.
865	RSI	All claims for retirement (old age) and survivors benefits under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405 (g))

Document 1 Filed 01/0

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT  
for the  
Central District of California

WILLARD L. WOODS, JR., on behalf of Writers' Guild-Industry Health Fund and Producer-Writers Guild of America Pension Plan

*Plaintiff(s)*

v.

TRANSFORMATION VENTURES, INC., a California corporation; and WILLIAM N. PHILLIPS, an individual.

**Defendant(s)**

**Civil Action No.**

CV14-00164 - TCG

## **SUMMONS IN A CIVIL ACTION**

To: *(Defendant's name and address)* TRANSFORMATION VENTURES, INC., 621 Corporate Circle, Suite E, Golden, CO 80401

WILLIAM N. PHILLIPS, 621 Corporate Circle, Suite E, Golden, CO 80401

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are: HIRSCH ADELL, WILLIAM SHEH, and NATALIA BAUTISTA, Members of REICH, ADELL & CVITAN, a Professional Law Corporation 3550 Wilshire Blvd., Suite 2000 Los Angeles, CA 90010

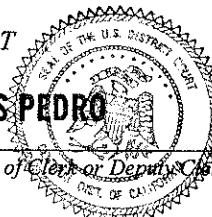
If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

Date: JAN - 8 / 2014

Date:

*CLERK OF COURT*

ANDRES PEDRO



*[Signature]* Signature of Clerk or Deputy Clerk

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